



**PRYOR CASHMAN LLP**

New York | Los Angeles

7 Times Square, New York, NY 10036 Tel: 212-421-4100 Fax: 212-326-0806

www.pryorcashman.com

**Ross M. Bagley**

Attorney at Law

Direct Tel: (212) 326-0405

Direct Fax: (212) 515-6953

rbagley@pryorcashman.com

September 18, 2014

**VIA US MAIL AND ECF**

Hon. Alvin K. Hellerstein  
Room 1050  
United States District Judge  
Daniel Patrick Moynihan  
United States Court House  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York NY 10007

**Re:** *Deep Woods Holdings LLC v. Savings Deposit Insurance Fund of the Republic of Turkey*  
Case No. 07-CV-934 (AJH)

Dear Judge Hellerstein:

The parties write to respectfully seek clarification on the Court's docket entries following the September 12, 2014 status conference in the case. At the conference, the Court set a schedule whereby Defendant SDIF (now, the "prevailing party" seeking fees) will submit its motion for attorneys' fees on September 26, 2014, Deep Woods will submit its opposition brief by October 10, 2014 (which brief may include, *inter alia*, argument by Deep Woods about SDIF's entitlement to fees for the appeal) and SDIF will reply by October 17, 2014. This schedule is reflected in a minute entry on September 12, 2014 in the Court's electronic docket.

On September 17, 2014, the Court issued a Scheduling Order whereby Deep Woods is to submit its brief on the issue of whether the attorneys' fees awarded to SDIF should include the fees incurred on SDIF's appeal by September 26, 2014, SDIF will then provide Deep Woods with a detailed report of its legal bills by October 3, 2014, SDIF will submit its opposition to Deep Woods' motion by October 10, 2014 and Deep Woods will submit its reply brief opposing SDIF's fee request by October 17, 2014.

It is respectfully submitted that the September 17, 2014 briefing schedule does not afford Deep Woods adequate time to contest SDIF's request for reasonable attorneys' fees and provides no opportunity for SDIF to respond to those arguments by Deep Woods. Accordingly, the

parties suggest that the September 12 minute entry affords the most efficient means of resolving the fee issue and respectfully request the Court to So Order that schedule.

Finally, we write to advise the Court that document number 217 on the Court's electronic docket appears to be a Discovery Order for an unrelated case.

Respectfully submitted,

s/s Ross M. Bagley  
James S. O'Brien, Jr.  
Ross M. Bagley  
PRYOR CASHMAN LLP  
7 Times Square  
New York, New York 10036  
Tel: 212 326 0405  
Fax: 212 515 6953  
rbagley@pryorcashman.com

Attorneys for Plaintiff  
*Deep Woods Holdings LLC*

AND

s/s Mark. A. Beckman  
Ronan J. McHugh (RM 1966)  
Mark A. Beckman (MB 6750)  
Gordon Rees Scully Mansukhani, LLP  
700 12<sup>th</sup> Street, Suite 1050  
Washington D.C.20005  
Tel: 202 399 1009  
Fax: 202 800 2999  
mbeckman@gordonrees.com

Attorney for Defendant  
*Savings Deposit Insurance Fund of the  
Republic of Turkey*